

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

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Illinois Commerce Commission  
RAIL SAFETY SECTION

County of Lake, Illinois, by Martin G.  
Buehler, County Engineer,

Petitioner,

v.

Wisconsin Central Ltd., Village of  
Buffalo Grove, Illinois and State of  
Illinois, Department of  
Transportation,

Respondents.

Docket No.  
T01-0063

Petition to increase the amount of minimum pre-emption time  
provided by Wisconsin Central Ltd. to the County of Lake for  
the traffic signal pre-emption sequence at the Aptakisic Road  
and Deerfield Parkway at-grade crossings of the Wisconsin  
Central Ltd. single main line tracks in the Village of Buffalo  
Grove, Lake County, Illinois and directing a substantial portion  
of the cost thereof to be borne by the Grade Crossing Protection  
Fund.

**ANSWER OF WISCONSIN CENTRAL LTD.**

Now comes the Respondent, Wisconsin Central Ltd. ("WCL"), and, as its answer  
to the Petition of the County of Lake ("County"), states as follows:

1. WCL admits the allegation contained in Paragraph 1 of the Petition.
2. Regarding Paragraph 2 of the Petition, WCL admits that Aptakisic Road  
crosses the WCL main line track at-grade and is identified as DOT 689-692X. With  
regard to the remaining allegations in Paragraph 2 of the Petition, WCL lacks sufficient  
information to either admit or deny them.
3. Regarding Paragraph 3 of the Petition, WCL admits that Busch Parkway  
crosses the WCL main line track at-grade and is identified as DOT 694-865V. With  
regard to the remaining allegations in paragraph 3 of the Petition, WCL lacks sufficient  
information that would allow it to either admit or deny them and its track charts do not  
show Deerfield Parkway crossing the WCL main line track at-grade

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4. With regard to Paragraph 4 of the Petition, WCL admits that Aptakisic Road and Busch Parkway have automatic flashing lights and gates at their aforementioned at-grade crossings. WCL lacks sufficient information that would allow it to admit or deny any allegations pertaining to Deerfield Parkway.

5. WCL lacks sufficient information that would allow it to admit or deny the allegations contained in paragraph 5 of the Petition.

6. WCL lacks sufficient information that would allow it to admit or deny the allegations contained in Paragraph 6 of the Petition.

7. WCL lacks sufficient information that would allow it to admit or deny the allegations contained in Paragraph 7 of the Petition.

8. WCL lacks sufficient information that would allow it to admit or deny the allegations contained in Paragraph 8 of the Petition.

9. WCL lacks sufficient information that would allow it to admit or deny the allegations contained in Paragraph 9 of the Petition.

10. Subject to any applicable federal preemption, WCL admits the allegations set forth in Paragraph 10 of the Petition.

#### **AFFIRMATIVE ALLEGATIONS**

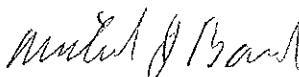
1. This proposed interconnection project as set forth in the County's Petition is initiated by, and done for, the benefit of the County, and has not been brought about by any changes in WCL's operations. As such, WCL should not bear any part of the cost.

**WHEREFORE**, WCL respectfully requests the Commission:

- a. Set this matter for hearing;
- b. Allocate the cost of any approved changes in this Docket between the Grade Crossing Protection Fund and the County of Lake; and
- c. Grant other relief that the Commission feels is just and reasonable.

Respectfully submitted,

WISCONSIN CENTRAL LTD.

  
Michael J. Barron, Jr.

Counsel for Wisconsin Central Ltd.  
Canadian National/Illinois Central Railroad  
455 North Cityfront Plaza Drive  
Chicago, IL 60611-5317  
(312) 755-7954  
Fax #(312) 755-7669  
ARDC No. 6228809

Dated: October 18, 2001

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

County of Lake, Illinois, by Martin G.  
Buehler, County Engineer,

Petitioner,

v.

Wisconsin Central Ltd., Village of  
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Illinois, Department of  
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**NOTICE OF FILING**

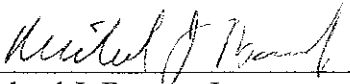
Mr. Ed Gower  
Chief Counsel  
Illinois Department of Transportation  
2300 S. Dirksen Pkwy., Room 300  
Springfield, IL 62764

Mr. Gregory P. Boysen, P.E..  
Director of Public Works  
Village of Buffalo Grove  
50 Raupp Blvd.  
Buffalo Grove, IL 60089

Mr. Martin G. Buehler, P.E.  
County Engineer  
Lake County Division of Transportation  
600 West Winchester Road  
Libertyville, IL 60048

PLEASE TAKE NOTICE that we have this 18th day of October, 2001, mailed for filing  
with the Illinois Commerce Commission, Wisconsin Central Ltd.'s Answer to the Petition  
of the County of Lake in the above-captioned matter, a copy of which is hereby served  
upon you.

WISCONSIN CENTRAL LTD.

By 

Michael J. Barron, Jr.

Counsel for Wisconsin Central Ltd.

Canadian National/Illinois Central Railroad

455 North Cityfront Plaza Drive

Chicago, IL 60611-5317

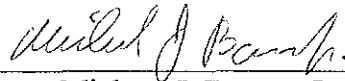
(312) 755-7954

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Bar No. 6228809

**CERTIFICATE OF SERVICE**

I, MICHAEL J. BARRON, JR., an attorney, certify that on behalf of Wisconsin Central Ltd., I served the foregoing Answer to the Petition of the County of Lake upon those made a party to this proceeding by enclosing copies of the foregoing in envelopes addressed to those parties as set forth below, postage prepaid, and depositing the envelopes in the United States Mail at 455 North Cityfront Plaza Drive, Chicago, IL on the 18th day of October, 2001.



Michael J. Barron, Jr.

Mr. Ed Gower  
Chief Counsel  
Illinois Department of Transportation  
2300 S. Dirksen Pkwy., Room 300  
Springfield, IL 62764

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